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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

PORTLAND GENERAL ELECTRIC
COMPANY, an Oregon corporation,

Plaintiff,

v.

STATE OF OREGON, by and through THE
OREGON DEPARTMENT OF STATE LANDS,
and +/- FIVE ACRES OF UNIMPROVED
LAND ALONG THE WILLAMETTE RIVER
NEAR WEST LINN, OREGON,

Defendants,

and

Case No.: 3:22-CV-00533-SI

**JOINT MOTION TO MODIFY
CASE MANAGEMENT
SCHEDULE**

CONFEDERATED TRIBES OF THE GRAND
RONDE COMMUNITY OF OREGON, a
federally-recognized Indian tribe,

Intervenor-Defendant.

LR 7.1 CERTIFICATION

In accordance with LR 7-1, the parties have conferred regarding this Motion and jointly request that the Court amend the Case Management Schedule as proposed below.

MOTION

Pursuant to Fed. R. Civ. P. 16 and LR 16-3(a), the parties jointly move the Court to amend the fact discovery deadline as well as the deadline for the filing, response, and replies to dispositive motions as follows:

Activity	Current Deadline	Requested Deadline
Fact Discovery Deadline	May 16, 2023	June 16, 2023
Dispositive Motions	June 16, 2023	July 17, 2023
Responses to Dispositive Motions	July 17, 2023	August 17, 2023
Replies to Dispositive Motions	July 31, 2023	August 31, 2023

The parties request an extension of the fact discovery deadline and subsequent deadlines relating to dispositive motions for several reasons. Plaintiff has recently supplemented its responses to Intervenor-Defendant's first request for production of documents and interrogatories. Plaintiff intends to produce additional documents in accordance with its supplemental response and additional time is necessary to allow Plaintiff to complete that production.

An extension of time is also necessary to ensure that Intervenor-Defendant has the ability to review the additional production and conduct additional discovery based on Plaintiff's supplemental production and interrogatory responses.

Finally, Intervenor-Defendant and Plaintiff are continuing to confer on discovery issues including depositions and Plaintiff's privilege log. An extension will allow the parties additional opportunities to meet and confer in an effort to resolve these issues.

This request for an extension of the fact discovery deadline is made in good faith and not for purposes of delay. The proposed change to the fact discovery deadline will affect the current deadlines for filing and responding to dispositive motions. Accordingly, the parties also request that the Court extend the deadlines for filing of and the responses and replies to dispositive motions as set out in the table above.

Dated: May 4, 2023.

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